



135947

# COMMONWEALTH of VIRGINIA

## STATE WATER CONTROL BOARD

2111 Hamilton Street

Richard N. Burton  
Executive Director

Post Office Box 11143  
Richmond, Virginia 23230-1143  
(804) 367-0056

Please reply to: Valley Regional Office  
116 North Main Street  
P. O. Box 268  
Bridgewater, Virginia 22812  
(703) 828-2595

18 August 1988

Ms. Ruth Rzepski  
Enforcement Project Manager  
DELMARVA/D.C/WV-CERCLA (3HW16)  
Remedial Enforcement Section  
EPA Region III  
841 Chestnut Building  
Philadelphia, PA 19107

Dear Ms. Rzepski:

This letter is in regard to our recent phone conversation concerning Avtex Fibers in Front Royal, Virginia. During the past few months, we have discussed the proposal to direct the collected ground water to the Industrial Wastewater Treatment Plant (IWWTP) for treatment prior to discharge. As we discussed earlier this summer, the company employed this general procedure as far back as 1984 with no apparent adverse impact to the treatment system. During 1984 and 1985 however, the ground water was pumped into the sulfate basins and thence to the IWWTP.

As I understand it, the current proposal calls for pumping directly to the treatment plant. Also, I am not certain of the relative pumping rates (i.e. the proposed direct pumping rate vs the return rate from the sulfate basin). At any rate, Avtex has been in persistent noncompliance with the NPDES Permit for this discharge since April 1987. Also recently, EPA's Guideline/Permits Group approved the proposed draft permit's BOD<sub>5</sub> limitations of 704 kg/d Monthly Average and 1878 kg/d Daily Maximum. At the end of June, Avtex took the aeration basin out of service for maintenance and for the removal of a large amount of organic and inert solids which had collected in the bottom of the unit. Following the removal of the solids, the plant was reseeded with fresh biological solids from the Front Royal STP. Avtex felt these steps would be sufficient to return the discharge to compliance. However, the July DMR shows no significant reduction in the BOD levels and did not demonstrate a return to compliance.

AR303890  
246

18 August 1988

- 2 -

Ms. Ruth Rzepski

In light of EPA's approval of the lower BOD<sub>5</sub> limitations and the company's continuing noncompliance, we do not believe that any additional load should be directed to the IWTP without construction of additional treatment facilities or a corresponding reduction of process loading.

Attached, please find copies of the tracking pages since 1984 and a general summary of the 004 limitation violations since 1980. Also attached, please find some data concerning the sulfate basins. We will forward additional data concerning the sulfate basins if we believe it to be useful. If I can be of any further help, please do not hesitate to contact me.

Sincerely,

*Bill Kregloe*

W. L. Kregloe  
Regulatory Services Engineer

/jf

cc: Lily Choi, OWRM  
VRO File  
Ken Hinkle, VRO  
EPA-Region III  
John Butcher, AG's Office

AR303891  
247